

March 31, 2025

BY ECF

Honorable Richard M. Berman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Keonne Rodriguez, et al.*, 24 Cr. 82 (RMB)

Dear Judge Berman:

We write on behalf of the parties in the above-referenced matter. During the last conference on May 18, 2025, the Court set a briefing schedule for pre-trial motions. The parties have now agreed to a slightly modified schedule, which we have submitted below for the Court's consideration:

- May 13, 2025: Defense motions
- May 20, 2025: Amicus briefs in support of defense motions
- June 10, 2025: Government responses
- June 24, 2025: Defense replies

Respectfully submitted,

Michael Kim Krouse

cc: AUSA Andrew Chan
AUSA David Felton
AUSA Cecilia Vogel